

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Abdi Nazemian, et al.,
Plaintiffs,
vs.

NVIDIA Corporation,
Defendant.

Andre Dubus III, et al.,
Plaintiffs,
vs.

NVIDIA Corporation,
Defendant.

Case No. 4:24-cv-01454-JST
Case No. 4:24-cv-02655-JST

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE ESI PROTOCOL AND
PROTECTIVE ORDER SCHEDULE**

Judge: Hon. Jon S. Tigar
Courtroom: 6 - 2nd Floor

1 Pursuant to Civil Local Rule 7-12 and the Court's Minute Entry for proceedings held on October
2 21, 2024, (ECF No. 80), the undersigned Parties to the above-captioned action, by and through their
3 respective counsel of record, hereby stipulate the following:

4 1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar
5 for an Initial Case Management Conference, (ECF No. 66);

6 2. WHEREAS, on September 9, 2024, the Court ordered the Parties to meet and confer on a
7 proposed protective order and ESI protocol order, and established a schedule and requirements for
8 submitting briefs if Parties could not reach agreement, (ECF No. 68);

9 3. WHEREAS, the Parties submitted their respective ESI protocol and protective order
10 proposals and accompanying briefs on September 9, 2024, (ECF Nos. 73, 74), and responses and
11 supplemental submissions thereafter (ECF Nos. 75, 76, 79);

12 4. WHEREAS, on October 21, 2024, the Parties appeared before the Court to present
13 arguments regarding their respective ESI protocols and protective order proposals (ECF No. 80);

14 5. WHEREAS, the Court directed the Parties to further meet and confer to resolve disputed
15 issues in their respective ESI protocol and protective order proposals, and to submit a stipulation or
16 competing proposals with accompanying briefs by November 4, 2024 (ECF No. 80);

17 6. WHEREAS, on November 4, 2024 the Parties stipulated to extend the deadline for
18 submitting a stipulation or competing proposals with accompanying briefs from November 4, 2024 to
19 November 14, 2024 (ECF No. 84), which was ordered by the Court on November 5, 2024 (ECF No. 85);

20 7. WHEREAS, the Parties have engaged in five (5) meet and confer conferences for over five
21 hours collectively and exchanged numerous redlined drafts of the ESI protocol and protective order
22 proposals since October 21, 2024, and have made significant progress toward narrowing the disputed
23 issues in the respective proposals; and

24 8. WHEREAS, the Parties believe that they can make additional progress by continuing to
25 meet and confer on the remaining disputed issues.

26 NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their
27 respective counsel, that the Parties' deadline to submit a stipulation, or competing proposed ESI
28

1 Protocols, Protective Orders, and supportive briefs not to exceed 5 pages, shall be extended from
2 November 14, 2024 to November 18, 2024.

1 Dated: November 14, 2024

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

3 Joseph R. Saveri (SBN 130064)
4 Christopher K.L. Young (SBN 318371)
5 Elissa A. Buchanan (SBN 249996)
6 Evan Creutz (SBN 349728)
7 **JOSEPH SAVERI LAW FIRM, LLP**
8 601 California Street, Suite 1505
9 San Francisco, California 94108
10 Telephone: (415) 500-6800
11 Facsimile: (415) 395-9940
12 Email: jsaveri@saverilawfirm.com
13 cyoung@saverilawfirm.com
14 eabuchanan@saverilawfirm.com
15 ecreutz@saverilawfirm.com

16 Matthew Butterick (SBN 250953)
17 1920 Hillhurst Avenue, #406
18 Los Angeles, CA 90027
19 Telephone: (323) 968-2632
20 Facsimile: (415) 395-9940
21 mb@buttericklaw.com

22 Brian D. Clark (admitted *pro hac vice*)
23 Laura M. Matson (admitted *pro hac vice*)
24 Arielle Wagner (admitted *pro hac vice*)
25 Eura Chang (admitted *pro hac vice*)
26 **LOCKRIDGE GRINDAL NAUEN PLLP**
27 100 Washington Avenue South, Suite 2200
28 Minneapolis, MN 55401
Telephone: (612)339-6900
Facsimile: (612)339-0981
bdclark@locklaw.com
lmmatson@locklaw.com
aswagner@locklaw.com
echang@locklaw.com

Attorneys for the Nazemian Plaintiffs and the Proposed Class

1 Dated: November 14, 2024

Respectfully submitted,

2 By: /s/ Bryan L. Clobes

3 Bryan L. Clobes (admitted *pro hac vice*)

4 Alexander J. Sweatman (admitted *pro hac vice*)

5 Mohammed Rathur (admitted *pro hac vice*)

**CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP**

135 South LaSalle Street, Suite 3210

Chicago, IL 60603

Tel: 312-782-4880

6 bclobes@caffertyclobes.com

7 asweatman@caffertyclobes.com

8 mrathur@caffertyclobes.com

9 David A. Straite (admitted *pro hac vice*)

10 **DiCELLO LEVITT LLP**

485 Lexington Avenue, Suite 1001

11 New York, NY 10017

12 Tel. (646) 933-1000

13 dstraite@dicellolevitt.com

14 Amy E. Keller (admitted *pro hac vice*)

15 Nada Djordjevic (admitted *pro hac vice*)

16 James A. Ulwick (admitted *pro hac vice*)

DiCELLO LEVITT LLP

17 Ten North Dearborn Street, Sixth Floor

18 Chicago, Illinois 60602

19 Tel. (312) 214-7900

20 akeller@dicellolevitt.com

21 ndjordjevic@dicellolevitt.com

22 julwick@dicellolevitt.com

23 Brian O'Mara (SBN 229737)

DiCELLO LEVITT LLP

24 4747 Executive Drive

25 San Diego, California 92121

26 Telephone: (619) 923-3939

27 Facsimile: (619) 923-4233

28 brian@dicellolevitt.com

Counsel for the Dubus Plaintiffs and Proposed Class

1 Dated: November 14, 2024

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &**
4 **SULLIVAN, LLP**

5 Sean S. Pak (SBN 219032)
6 seanpak@quinnemanuel.com
7 50 California Street, 22nd Floor
8 San Francisco, CA 94111
9 Telephone: (415) 875-6600
10 Facsimile: (415) 875-6700

11 Andrew H. Schapiro (admitted *pro hac vice*)
12 andrewschapiro@quinnemanuel.com
13 191 N. Wacker Drive, Suite 2700
14 Chicago, Illinois 60606
15 Telephone: (312) 705-7400
16 Facsimile: (312) 705-4001

17 Alex Spiro (admitted *pro hac vice*)
18 alexspiro@quinnemanuel.com
19 51 Madison Avenue, 22nd Floor
20 New York, NY 10010
21 Telephone: (212) 849-7000
22 Facsimile: (212) 849-7100

23 *Attorneys for Defendant NVIDIA Corporation*

~~[PROPOSED]~~ ORDER

Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED that the Parties deadline for filing a stipulated ESI Protocol and stipulated Protective Order, or filing the Parties' respective proposals and briefs shall be continued to November 18, 2024.

IT IS SO ORDERED.

Dated: November 15, 2024



The Honorable Jon S. Figar
U.S. District Court Judge

ATTESTATION PURSUANT TO CIVIL L.R. 5-1

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: November 14, 2024

/s/ Joseph R. Saveri
Joseph R. Saveri